

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL J. MITCHELL and	:	
TAMMITHA M. MITCHELL, husband	:	
and wife	:	
	:	
vs.	:	CI-02-CV3652
	:	
POWERMATIC CORPORATION, a/k/a	:	
POWERMATIC, INC., JET EQUIPMENT	:	
& TOOLS, INC., AND DEVLIEG-	:	
BULLARD, INC. a/k/a DEVLIEG	:	JURY TRIAL DEMANDED
BULLARD II, INC.	:	

PRE-TRIAL DISCLOSURES ON BEHALF OF
WMH TOOL GROUP, INC. (FORMERLY KNOWN AS
JET EQUIPMENT & TOOLS, INC.) SUCCESSOR-BY-MERGER
TO POWERMATIC CORPORATION

I. Witnesses

A. Liability

1. Expect to Call

- (a) Ben Nixon, WMH Tool Group, Inc.
- (b) Sam Ellis, WMH Tool Group, Inc.
- (c) William Bernstein, Esquire
- (d) Dean Gochnauer of Brubaker Kitchens, Inc.
- (e) Edward Cornelius of Brubaker Kitchens, Inc.
- (f) Defendant reserves the right to call any witness listed by the plaintiff or the co-defendant.

2. May Call

- (a) Robert Romano, Esquire, Vice President and General Counsel of WMH Tool Group, Inc.
- (b) Walter Painter, a liability expert retained by co-defendant.

B. Damages

1. Expect to Call

- (a) Mark Lukas, 25 West Third Street, Media, PA 19063, vocational and evaluation expert.
- (b) Defendant reserves the right to call as a witness those persons named in the pre-trial disclosures of the plaintiffs and the co-defendant.

II. EXHIBITS

A. Liability

- 1. Instruction manual for the Powermatic shaper.
- 2. Warning label for the Powermatic shaper.
- 3. Blueprints and photographs of the Model 27 shaper.
- 4. Certificate of Incorporation of Powermatic Corporation.
- 5. Certification of Dissolution of Powermatic, Inc.
- 6. Asset Purchase Agreement of August 20, 1999 between DeVlieg-Bullard, Inc. and Sun Hill NIC Company, Inc.
- 7. Agreement of September 27, 1999 between DeVlieg-Bullard, Inc. and Jet Equipment & Tools, Inc.
- 8. Order of September 29, 1999 of the U.S. Bankruptcy Court for the Northern District of Ohio in re: DeVlieg-Bullard, Inc.
- 9. Assignment and Assumption Agreement between Powermatic Corporation and Jet Equipment & Tools, Inc.
- 10. Bill of Sale, Assignment and Assumption Agreement between DeVlieg-Bullard, Inc. and Powermatic Corporation.
- 11. Affidavit of William Bernstein, Esquire, of March 12, 2003.
- 12. Defendant reserves the right to utilize as exhibits those documents referenced in the pre-trial disclosures of the plaintiffs and co-defendant.

B. Damages

- 1. Report of Mark Lukas, 25 West Third Street, Media, PA 19063, vocational and evaluation expert.

2. Exhibits marked at the depositions of Gochnauer and Cornelius.
3. W-2s and tax returns of Michael Mitchell.

Defendant reserves the right to use as exhibits those documents referenced in the pre-trial disclosures of the plaintiffs and co-defendant.

BENNETT, BRICKLIN & SALTZBURG LLP

BY:

JOEL PAUL FISHBEIN, Esquire
Attorney for Defendant
WMH Tool Group, Inc., (Formerly
Known as Jet Equipment & Tools, Inc.),
Successor-By-Merger to Powermatic
Corporation

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& TOOLS, INC., AND DEVLIEG-
BULLARD, INC. a/k/a DEVLIEG
BULLARD II, INC.

JURY TRIAL DEMANDED

I do hereby certify that service of a true and correct copy of the pre-trial disclosures of WMH Tool Group, Inc. (Formerly Known as Jet Equipment & Tools, Inc.) Successor-By-Merger to Powermatic Corporation was made on the 18th day of August, 2003, to the parties listed below by:

Soren P. West, Esquire
319 North Duke Road
Lancaster, PA 17602-4915
Via Facsimile and Regular Mail

Warren E. Voter, Esquire
Sweeney & Sheehan
1515 Market Street, 19th Floor
Philadelphia, PA 19102
Via Facsimile and Regular Mail

BENNETT, BRICKLIN & SALTZBURG LLP

BY: _____

JOEL PAUL FISHBEIN, Esquire
Attorney for Defendant,
WMH Tool Group, Inc., (Formerly
Known as Jet Equipment & Tools, Inc.),
Successor-By-Merger to Powermatic
Corporation